

CARLA A. McCAULEY (State Bar No. 223910)
 carlamccauley@dwt.com
 DAVIS WRIGHT TREMAINE LLP
 865 South Figueroa Street, 24th Floor
 Los Angeles, California 90017-2566
 Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice*)
 robbalin@dwt.com
 LACY H. KOONCE, III (*pro hac vice*)
 lancekoonce@dwt.com
 SAMUEL BAYARD (*pro hac vice*)
 samuelbayard@dwt.com
 GEORGE WUKOSON (*pro hac vice*)
 georgewukoson@dwt.com

DAVIS WRIGHT TREMAINE LLP
 1251 Avenue of the Americas, 21st Floor
 New York, New York 10020
 Tel.: (212) 489-8230 Fax: (212) 489-8340
 ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 AMIT BHALLA, an individual;
 NEWTPAD LTD. COMPANY d/b/a
 NEWTPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

Defendants.

Case No.
CV 15-1869 MMM (AJWx)

**DECLARATION OF CARLA
 A. McCAULEY IN SUPPORT
 OF PLAINTIFFS' REQUEST
 FOR ATTORNEYS' FEES RE:
 ORDER GRANTING
 DEFAULT JUDGMENT AS TO
 DEFENDANTS CREATE NEW
 TECHNOLOGY (HK)
 LIMITED AND HUA YANG
 INTERNATIONAL
 TECHNOLOGY LIMITED**

Courtroom: 780
 Judge: Hon. Margaret M.
 Morrow

Complaint Filed: March 13, 2015

1 I, Carla A. McCauley, declare as follows:

2 1. I am licensed to practice law before all the courts in the State of
3 California and am admitted to the Central District of California and the United States
4 Court of Appeals for the Ninth Circuit. I am a partner at Davis Wright Tremaine
5 LLP, counsel for Plaintiffs in the above-entitled matter. I submit this Declaration in
6 further support of Plaintiffs' request for attorneys' fees made in conjunction with
7 Plaintiffs' Motion for Default Judgment Against Defendants Create New Technology
8 (HK) Limited and Hua Yang International Technology Limited (Motion for Default
9 Judgment). I have personal knowledge of the facts contained herein, and, if called
10 upon as a witness, I could and would testify competently about these facts, except for
11 those matters stated expressly upon information and belief, which matters are
12 believed to be true.

13 2. By Order dated December 7, 2015, the Court granted Plaintiffs' Motion
14 for Default Judgment. In the Order, the Court directed Plaintiffs to file a declaration
15 "stating the hourly rates of the attorneys who have worked on this matter and the
16 number of hours expended litigating matters related to the liability of CNT and
17 HYIT." *See* Order at 44:5-7.

18 3. Consistent with the Court's Order, I analyzed all of Plaintiffs' invoiced
19 billing entries to ascertain both the hourly rates and the total invoiced billable hours
20 and amounts billed to Plaintiffs that related to litigating CNT and HYIT's liability,
21 consistent with the Court's Order.

22 4. Seven attorneys in the United States and China and two paralegals
23 assisted on this matter. The billing rate for Rob Balin, a partner in DWT's New York
24 office, was \$585 per hour for this matter. The billing rate for Rongwai Cai, a partner
25 in DWT's Shanghai office, was \$580.50 per hour for this matter. The billing rate for
26 Lacy H. Koonce, a partner in DWT's New York office, was \$495 per hour for this
27 matter. The billing rate for Carla A. McCauley, a partner in DWT's Los Angeles
28 office, was \$459 per hour for this matter. The billing rate for Samuel Bayard, an

1 associate in DWT's New York office, was \$459 per hour for this matter. The billing
 2 rate for George Wukoson, an associate in DWT's New York office, was \$414 per
 3 hour for this matter. The billing rate for Alan Huang, an associate in DWT's
 4 Shanghai office, was \$211.50 per hour for this matter. The billing rate for John
 5 Arweiler, a paralegal in DWT's New York office, was \$171 per hour in this matter.
 6 The billing rate for Warren Keville, a paralegal in DWT's Los Angeles office, was
 7 \$139.50 per hour for this matter.

8 5. When totaling all time entries that related to CNT and HYIT's liability
 9 in this action, the total hours billed to Plaintiffs equal 3,217 hours. Plaintiffs have
 10 incurred attorneys' fees of \$1,451,490 for the billed hours associated with CNT and
 11 HYIT's liability.

12 I declare under penalty of perjury under the laws of the United States of
 13 America that the foregoing is true and correct.

14 Executed this 11th day of December, 2015.

15 /s/ Carla A. McCauley
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 17 Carla A. McCauley
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